

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Bankruptcy No. 16-22970-CMB
	:	
KAYLA LEANN BOYD	:	Chapter 7
	:	
<i>Debtor</i>	:	Doc. No.
	:	
Wells Fargo Bank, NA	:	Related to Doc. No. 17
	:	
Movant	:	
	:	
v.	:	
	:	
Kayla Leann Boyd and	:	
Natalie Lutz Cardiello, Esquire (Trustee)	:	
	:	
Respondents	:	

**TRUSTEE'S RESPONSE TO  
MOTION OF WELLS FARGO BANK, NA FOR RELIEF FROM THE  
AUTOMATIC STAY UNDER §362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

AND NOW comes Natalie Lutz Cardiello, Trustee, by and through her attorney, Natalie Lutz Cardiello, Esquire, and files the within Response to Motion of Wells Fargo Bank, NA for Relief from the Automatic Stay Under §362 Pursuant to Bankruptcy Procedure Rule 4001 (the "Motion") filed in the above matter.

1. The Debtor filed a Voluntary Petition under Chapter 7 of the Bankruptcy Code on August 11, 2016.
2. Natalie Lutz Cardiello was duly appointed Trustee and has been so serving.
3. The Motion was filed in connection with the Debtor's property located at 733 Garfield Street, Springdale, PA 15144 (the "Property").
4. The Trustee has recently been working with BK Global in an effort to negotiate carve out arrangements with lenders for the benefit of the Bankruptcy Estate.
5. The Trustee does not object to the relief requested by Movant, but requests a reasonable period of time of six months to market and sell the property.
6. In the event that the Trustee determines that a sale of the property is not feasible before the expiration of the six month waiting period, the Trustee will file a Report of No Distribution, at which time the Movant can proceed with its requested relief.

WHEREFORE, the Trustee requests that this Honorable Court enter an Order granting the Motion of Wells Fargo Bank, NA for Relief from the Automatic Stay Under §362 Pursuant to Bankruptcy Procedure Rule 4001, effective as of April 25, 2017, or at such earlier time as the Trustee files a Report of No Distribution.

Dated: October 16, 2016

Respectfully submitted,

/s/ Natalie Lutz Cardiello  
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